

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ROBERT SYLVESTER KELLY,

Defendant,

and

UNIVERSAL MUSIC PUBLISHING, INC.,

Garnishee.

Criminal Docket No.  
CR-19-02886 (AMD)

ANSWER OF THE GARNISHEE

ANTHONY SARAGUETA, BEING DULY SWORN DEPOSES AND SAYS:

IF GARNISHEE IS A CORPORATION:

That he is the Senior Vice President, North American Administration – Los Angeles, of Garnishee, Universal Music Publishing, Inc., a corporation organized under the laws of the State of California.

On June 14, 2023, Garnishee was served with the Writ of Continuing Garnishment.

For the pay period in effect on the date of service of the Writ of Continuing Garnishment, as indicated above:

1. Was Defendant-Judgment Debtor (“Debtor”) in your employ?

\_\_\_\_\_ Yes        X   No

2. Defendant is paid, as follows: N/A.

3. The pay period in effect on the date of service of the Writ of Continuing Garnishment: N/A.

4. Calculate amount of Debtor's net wages: N/A.

5. Have previous garnishments been issued with respect to the above-referenced Debtor?

           Yes       X       No

6. Garnishee has custody, control, or possession of the following non-earnings property in which the Debtor maintains an interest, as described below:

Description of Property	Approximate Value	Description of Debtor's Interest in Property
VACF – Kelly, Robert pka R. Kelly	\$567,444.19	Music publishing royalties

7. Garnishee does not have custody, control, or possession of any other property in which Debtor maintains an interest.

8. Garnishee anticipates owing music publishing royalties to Debtor in the future. The amount of such payments is unknown because it will depend on the extent to which Debtor's musical compositions are purchased, downloaded, synchronized, or otherwise exploited during future royalty accounting periods. Royalties are accounted on a semi-annual basis. Accordingly, royalties for the accounting period running from January 1, 2023 to June 30, 2023 are due to be paid on or before September 30, 2023. Royalties for the period running from July 1, 2023 to December 31, 2023 are due to be paid on or before March 31, 2024.

9. The Garnishee has filed the original answer via PACER by mailing or delivering the answer to: (1) Clerk of the Court, Eastern District of New York, United States Courthouse, 225 Cadman Plaza East, Brooklyn New York; and (2) mailed copies of the answer by first class mail to Jennifer Ann Bonjean, Esq., Bonjean Law Group, PLLC, 750 Lexington Avenue – 9<sup>th</sup> Floor, New York, NY 10022 and Daniel G. Saavedra, Assistant U.S. Attorney, United States Attorney's Office, 271 Cadman Plaza East, Brooklyn, New York 11201



Anthony Saragueta

STATE OF California )

COUNTY OF Los Angeles ) ss.:

Sworn to before me

This 21 day of June, 2023

See attached CA Statutory  
NOTARY PUBLIC acknowledgment.

## ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

On June 21, 2023 before me, Jerrold Grannis  
(insert name and title of the officer)

personally appeared Anthony Sarcueta,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are  
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in  
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the  
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing  
paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)

